

# LEWIS & LIN LLC

Brett E. Lewis  
David D. Lin

—  
Michael D. Cilento  
Michael Druckman  
Jane J. Jaang  
Roberto Ledesma  
Savita Sivakumar  
Rachel Ann Stephens  
Shuyu Wang

77 Sands Street, 6th Floor  
Brooklyn, NY 11201

Tel: (718) 243-9323  
Fax: (718) 243-9326

[www.iLawco.com](http://www.iLawco.com)

David D. Lin  
(718) 243-9325  
[david@iLawco.com](mailto:david@iLawco.com)

September 8, 2023

Magistrate Judge Jessica S. Allen  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

*Nourison Industries, Inc. v. Hangzhou Qixincai Household Products Co., Ltd.*,  
Case Number: 2:23-cv-03007-MCA-JSA

Dear Magistrate Judge Allen:

I am counsel for defendant/counterclaim plaintiff Hangzhou Qinxincai (“HQ”) and write jointly with counsel for plaintiff/counterclaim defendant Nourison Industries pursuant to the Court’s Text Order of September 6 (ECF No. 15). The parties have discussed the possibility of settlement and anticipate using the next two weeks to continue those discussions. Accordingly, we ask that any further action on HQ’s motion for preliminary injunction (ECF No. 7) be stayed pending further update from the parties. We intend to provide a status update to the Court by Friday, September 22.

We thank the Court for its consideration.

**SO ORDERED**

/s/ Jessica S. Allen  
Hon. Jessica S. Allen, U.S.M.J.

**Date:** 9/11/23

LEWIS & LIN LLC

Respectfully submitted,

/s/ David D. Lin

David D. Lin